

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT**

**IN RE:**

**SHAWN AND RASHYEDA LEWIS,**

**Debtors.**

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**Chapter 13  
Case No: 13-61677  
Hon. TUCKER**

**MOTION FOR ENTRY OF ORDER REINSTATING  
DEBTORS' CHAPTER 13 BANKRUPTCY CASE**

**NOW COME SHAWN AND RASHYEDA LEWIS**, the Debtors herein, by and through the Debtors' Attorneys, Kostopoulos & Associates, PLLC, and in support of their Motion for Entry of Order Reinstating Debtors' Bankruptcy Case state as follows:

1. Debtors filed a Chapter 13 voluntary petition on November 27, 2013.
2. An Order Adjourning Confirmation Hearing was entered on February 21, 2014, which provided for dismissal of the Debtors' case if they are not current on their Chapter 13 payments with the Chapter 13 Standing Trustee by March 27, 2014.
3. Debtors were unable to manage to catch up on payments by the due date and, as a result, their case was dismissed on March 31, 2014. The Debtors' payment history at the time of dismissal was 71%.
4. As of March 27, 2014, Debtors had been struggling to make additional payments to cure the delinquency to the Trustee.
5. Albeit past the deadline, Debtors have managed to make a payment of \$440.00 to the Trustee on March 31, 2014—merely one business day after the deadline. These funds will make Debtors over 100% paid in their plan payments. A copy of the money order is attached as Exhibit 6.
6. Debtors and Counsel have discussed the importance of making timely payments to the Trustee and Debtors stand resolute to make all required plan payments and fulfill all obligations under their plan.
7. Communication has been sent to the Trustee's office on potential stipulation of reinstating this case.
8. A proposed Order is attached to this Motion as Exhibit 1.
9. A Notice of Motion is attached to this Motion as Exhibit 2.

**WHEREFORE,** Debtors respectfully request that this Honorable Court grant their Motion for Entry of Order Reinstating Debtors' Bankruptcy Case.

Respectfully submitted,

Dated: April 1, 2014

/s/ Toni Valchanov  
Kostopoulos & Associates PLLC  
A. Rita Kostopoulos (P63178)  
Steven Zeer (P71196)  
Heather Burnard (P66321)  
Toni Valchanov (P75398)  
Attorney for the Debtor(s)  
30800 Van Dyke, Suite 204  
Warren, MI 48093  
586-574-0916  
[law@kostopouloslawyers.com](mailto:law@kostopouloslawyers.com)

**United States Bankruptcy Court  
Eastern District of Michigan**

In re **Shawn and Rashyeda Lewis**

Case No. **13-61677**

Debtor

Address Shawn and Rashyeda Lewis, 7697 Berwick Ypsilanti, MI 48197

Chapter **13**

Last four digits of Social Security or Individual

Tax-payer Identification (ITIN) No(s), (if any): **xxx-xx- 8340; xxx-xx- 1979**

Employer's Tax Identification (EIN) No(s). (if any):  
\_\_\_\_\_

**NOTICE OF MOTION FOR ENTRY OF ORDER REINSTATING DEBTORS' CHAPTER 13 BANKRUPTCY CASE**

**Shawn and Rashyeda Lewis** have filed papers with the court to reinstate their bankruptcy case.

**Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief sought in the motion, or if you want the court to consider your view on the motion, **within 14 days**, you or your attorney must:

1. File with the court a written response or an answer, that complies with F.R. Civ. P. 8(b),(c) and (e), explaining your position at:

United States Bankruptcy Court  
211 W. Fort Street, Suite 2100  
Detroit, Michigan 48226

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. All attorneys are required to file pleadings electronically.

You must also mail a copy to:

Kostopoulos and Associates, PLLC, 30800 Van Dyke, Ste. 204, Warren, MI 48093  
Chapter 13 Trustee: TAMMY TERRY, 535 GRISWOLD, SUITE 2100, DETROIT, MI 48226  
Shawn and Rashyeda Lewis, 7697 Berwick Ypsilanti, MI 48197

2. If a response or answer is timely filed and served, the clerk will schedule a hearing on the motion and you will be served with a notice of the date, time and location of the hearing.

**If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.**

Date **April 1, 2014**

Signature /s/ Toni Valchanov

Name **Toni Valchanov P75398**

Address **Kostopoulos and Associates, PLLC  
30800 Van Dyke, Ste. 204  
Warren, MI 48093  
586-574-0916  
[law@kostopouloslawyers.com](mailto:law@kostopouloslawyers.com)**

EXHIBIT 2

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT**

**IN RE:**

**SHAWN AND RASHYEDA LEWIS,**

**Debtors.**

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**Chapter 13  
Case No: 13-61677  
Hon. TUCKER**

**ORDER REINSTATING DEBTORS' BANKRUPTCY CASE**

This matter having come before this Honorable Court on the Motion of Debtors, for an Order Reinstating Debtors' Chapter 13 Bankruptcy Case, and the Court being fully advised in the premises; therefore,

**IT IS HEREBY ORDERED** that Debtors' Chapter 13 Bankruptcy is reinstated and the Order Dismissing the Case is set aside.

EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT**

**IN RE:**

**SHAWN AND RASHYEDA LEWIS,**

**Debtors.**

**Chapter 13  
Case No: 13-61677  
Hon. TUCKER**

**CERTIFICATE OF SERVICE**

Toni Valchanov under penalty of contempt of court, states that on 4/1/2014, he served Motion for Entry of Order Reinstating Debtors' Bankruptcy Case, EXHIBITS 1, 2, 3, 4, and 6 in said case with the Clerk of the Court using the E.C.F. system which will send notification of such filing to the following parties:

TRUSTEE: Tammy L. Terry: [mieb\\_ecfadmin@det13.net](mailto:mieb_ecfadmin@det13.net)

/s/ Toni Valchanov  
Kostopoulos & Associates PLLC  
A. Rita Kostopoulos (P63178)  
Steven Zeer (P71196)  
Heather Burnard (P66321)  
Toni Valchanov (P75398)  
Attorney for the Debtor(s)  
30800 Van Dyke, Suite 204  
Warren, MI 48093  
586-574-0916  
[law@kostopouloslawyers.com](mailto:law@kostopouloslawyers.com)

and Toni Valchanov under penalty of contempt of court, states that on 4/1/2014, he served Motion for Entry of Order Reinstating Debtors' Bankruptcy Case, EXHIBITS 1, 2, 3, 4, and this CERTIFICATE OF SERVICE by depositing said copies in the U.S. Mail, postage prepaid, properly addressed as follows:

CREDITORS: All Creditors on the Attached P.A.C.E.R. Matrix

NOTE: EXHIBIT 6 HAS BEEN FILED WITH THE COURT. IT IS AVAILABLE FOR REVIEW ON THE COURT FILING SYSTEM.

/s/ Toni Valchanov  
Kostopoulos & Associates PLLC  
A. Rita Kostopoulos (P63178)  
Steven Zeer (P71196)  
Heather Burnard (P66321)  
Toni Valchanov (P75398)  
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**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
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**IN RE:**

**SHAWN AND RASHYEDA LEWIS,**

**Debtors.**

**Chapter 13  
Case No: 13-61677  
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**CERTIFICATE OF SERVICE**

Toni Valchanov under penalty of contempt of court, states that on 4/1/2014, he served Motion for Entry of Order Reinstating Debtors' Bankruptcy Case, EXHIBITS 1, 2, 3, 4, and 6 in said case with the Clerk of the Court using the E.C.F. system which will send notification of such filing to the following parties:

TRUSTEE: Tammy L. Terry: [mieb\\_ecfadmin@det13.net](mailto:mieb_ecfadmin@det13.net)

/s/ Toni Valchanov  
Kostopoulos & Associates PLLC  
A. Rita Kostopoulos (P63178)  
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Heather Burnard (P66321)  
Toni Valchanov (P75398)  
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and Toni Valchanov under penalty of contempt of court, states that on 4/1/2014, he served Motion for Entry of Order Reinstating Debtors' Bankruptcy Case, EXHIBITS 1, 2, 3, 4, and this CERTIFICATE OF SERVICE by depositing said copies in the U.S. Mail, postage prepaid, properly addressed as follows:

CREDITORS: All Creditors on the Attached P.A.C.E.R. Matrix

NOTE: EXHIBIT 6 HAS BEEN FILED WITH THE COURT. IT IS AVAILABLE FOR REVIEW ON THE COURT FILING SYSTEM.

/s/ Toni Valchanov  
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Heather Burnard (P66321)  
Toni Valchanov (P75398)  
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**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
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**IN RE:**

**SHAWN AND RASHYEDA LEWIS,**

**Debtors.**

**Chapter 13  
Case No: 13-61677  
Hon. TUCKER**

**CERTIFICATE OF NON-RESPONSE  
TO DEBTORS' MOTION FOR ENTRY OF ORDER REINSTATING  
DEBTORS' CHAPTER 13 BANKRUPTCY CASE**

**Toni Valchanov** hereby certifies that I am one of the attorneys for the above named Debtors; notices were mailed out to the creditors, Debtors, and Chapter 13 Trustee on \_\_\_\_\_, regarding the Motion for Entry of Order Reinstating Debtors' Bankruptcy Case, and no objections have been properly filed with the Court.

Under penalty of contempt of court, I declare that the statements above are true to the best of my information, knowledge and belief.

Dated: \_\_\_\_\_

/s/ Toni Valchanov  
Kostopoulos & Associates PLLC  
A. Rita Kostopoulos (P63178)  
Steven Zeer (P71196)  
Heather Burnard (P66321)  
Toni Valchanov (P75398)  
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EXHIBIT 3

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT**

**IN RE:**

**SHAWN AND RASHYEDA LEWIS,**

**Debtors.**

**Chapter 13  
Case No: 13-61677  
Hon. TUCKER**

**CERTIFICATE OF SERVICE**

Toni Valchanov, under penalty of contempt of court, hereby certifies that on \_\_\_\_\_ he served **Certificate of Non-Response to Motion for Entry of Order Reinstating Debtors' Bankruptcy Case and Certificate of Service of same**, in said case upon the following party via the E.C.F. system, which will provide electronic notice to the following:

TRUSTEE: Tammy L. Terry: [mieb\\_ecfadmin@det13.net](mailto:mieb_ecfadmin@det13.net)

/s/ Toni Valchanov  
Kostopoulos & Associates PLLC  
A. Rita Kostopoulos (P63178)  
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Heather Burnard (P66321)  
Toni Valchanov (P75398)  
Attorney for the Debtor(s)  
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